

**NATALIE K. WIGHT, OSB #035576**  
United States Attorney  
District of Oregon  
**M. ALEX DELORENZO, OSB #203641**  
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Attorneys for United States of America

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**EUGENE DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**VERONICA VASQUEZ,**

**Defendant.**

**CASE NO.:**

**COMPLAINT FOR DEBT OWED TO  
THE UNITED STATES**

Plaintiff, United States of America, brings this Complaint seeking to collect civil penalties against Veronica Vasquez (“Defendant”) for the importation of counterfeit merchandise determined to be infringing on multiple trademarks under 19 U.S.C. § 1526(f).

**NATURE OF THE ACTION**

1. This is a civil action brought to collect a civil penalty of \$882,368.00 pursuant to 19 U.S.C. § 1526(f) and 19 C.F.R. § 133.27(a). U.S. Customs and Border Protection (“Customs”) imposed penalties on Defendant for importing merchandise that infringed on 31 registered and recorded trademarks, including those of Louis Vuitton, Gucci, Christian Dior, and Burberry.

### JURISDICTION AND VENUE

2. This Court has jurisdiction over this matter under 28 U.S.C. § 1345.

3. Venue is proper in the District of Oregon under 28 U.S.C. § 1391(b)(1) because the Defendant is a resident of Deschutes County, Oregon, and is proper under 28 U.S.C. § 1395(a) because the penalties accrued in Oregon and under 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to the claims occurred in this district.

### FACTUAL BACKGROUND

4. On March 30, 2020, Customs seized nine DHL express packages in Portland, Oregon. On April 2, 2020, two additional DHL express packages were seized. Defendant was the Importer of Record on all eleven seized packages. Exhibit 1, pg. 1, Notice of Penalty, Dated: October 21, 2020.

5. The seized packages were found to have contained counterfeit merchandise, including handbags, wallets, belts, ball caps, sweaters, t-shirts, sweatsuits, backpacks, and jewelry which infringed on 31 different registered trademarks. Exhibit 1, pgs. 1, 3-7. The packages were forfeited under 19 U.S.C. § 1526(e). *Id.*

6. Customs assessed a civil penalty of \$882,368.00 (equal to not more than the value the merchandise would have had if it were genuine, according to the manufacturer's suggested retail price) against Defendant on October 21, 2020. Exhibit 1. Defendant had 60 days, until December 20, 2020, to pay the penalty or file a petition for relief. *Id.*

7. Defendant took neither action and on December 26, 2020, Customs issued a first notice demand for the full \$882,368.00 penalty, due January 5, 2021. Exhibit 2.

8. Defendant failed to pay the assessed penalty, and on January 9, 2021, Customs issued a second demand notice for the full \$882,368.00 penalty, due immediately. Exhibit 3.

9. Defendant again failed to pay the assessed penalty. On January 23, 2021, Customs issued a third and final demand notice for the full \$882,368.00 penalty. The final demand noted that the matter would be referred for legal action ten days from the date of notice. Exhibit 4.

10. Defendant failed to pay the assessed penalty. On March 25, 2021, Customs again reached out to Defendant offering an additional 15 days, until April 9, 2021, for her to make her payment and avoid litigation. Exhibit 5.

11. Defendant again failed to pay the assessed penalty. On June 7, 2024, the U.S. Attorney's Office sent a letter, demanding payment. Exhibit 6. As of the date of this filing, Defendant has failed to respond.

12. To date, no payment has been made toward the penalty. The Certificate of Indebtedness provides that Defendant is indebted to the United States in the principal total amount of \$882,368.00. Exhibit 7.

#### CAUSE OF ACTION

13. Defendant's debt to the United States remains unpaid despite several demands for payment.

14. The Federal Debt Collection Procedures Act ("FDCPA"), 28 U.S.C. § 3001, *et seq.*, provides the procedures for collecting a debt.

15. "Debt" includes an amount owing to the United States on account of a penalty. 28 U.S.C. § 3002(3)(B).

16. The FDCPA provides that the Federal Rules of Civil Procedure shall apply. 28 U.S.C. § 3003(f).

17. Therefore, the United States files this Complaint pursuant to the Federal Rules seeking a judgment against Defendant for the penalty imposed pursuant to 19 U.S.C. § 1526(f).

PRAYER FOR RELIEF

18. The United States respectfully requests:

- a. Judgment against Defendant in the principal total amount of \$882,368.00.
- b. Interest on the judgment to accrue at the post-judgment rate until paid in full pursuant to 28 U.S.C. § 1961.
- c. For costs and disbursements incurred in this action.
- d. Any such further relief as the Court deems just and reasonable.

Dated: July 23, 2024.

Respectfully submitted,

NATALIE K. WIGHT, OSB #035576  
United States Attorney

/s/ M. Alex DeLorenzo  
M. ALEX DELORENZO, OSB #203641  
Assistant United States Attorney

<b>DEPARTMENT OF HOMELAND SECURITY</b> <b>U.S. CUSTOMS AND BORDER PROTECTION</b> <b>NOTICE OF PENALTY OR LIQUIDATED DAMAGES INCURRED</b> <b>AND DEMAND FOR PAYMENT</b> <b>19 USC 1618 AND 19 USC 1623</b>		<b>Case Number</b> <b>2021290430000101</b>	
		<b>Port Code and Name</b> <b>2904 PORTLAND, OR</b>	
<b>TO: Vasquez, VERONICA</b> <b>3530 SOUTHWEST ANTELOPE AVENUE</b> <b>REDMOND, OR 97756</b>			
<p>Demand is hereby made for payment of <u>\$882,368.00</u> , representing <input checked="" type="checkbox"/> Penalties <input type="checkbox"/> Liquidated damages assessed against you for violation of law or regulation, or breach of bond, as set forth below:</p> <p>On 03/30/2020 at DHL Express Consignment, Portland, Oregon, U.S. Customs and Border Protection seized On 3/30/2020 at Portland, Oregon, U. S. Customs and Border Protection seized 9 DHL express packages containing counterfeit merchandise, 6632763616, 7906914864, 6197546014, 1455084536, 6342426565, 6610322913, 3641638114, 3025132961 and 3249386976 (see attached). On 4/2/2020 at Portland, Oregon, U. S. Customs and Border Protection seized 2 DHL express packages containing counterfeit merchandise, 3145805714 and 9552075643 (see attached). and forfeited it pursuant to the provisions of title 19, United States Code, section 1526(e), (19 USC 1526(e)), as it was determined to be counterfeit, infringing on The merchandise included handbags, wallets, belts, ball caps, sweaters, t-shirts, sweat suits, backpacks and jewelry which infringed on a total of 31 different registered trademarks (see attached).. You were involved in this seizure in the following manner: You are identified as the Importer of Record (IOR)..</p> <p>As a person directing, assisting financially or otherwise, or aiding and abetting the importation of this merchandise, you are subject to a civil penalty in an amount not more than the value the merchandise would have had if it were genuine, according to the manufacturer's suggested retail price (MSRP).</p> <p>Please note our office phone has changed, we may be reached at is 503-335-2950.</p>			
<b>LAW OR REGULATION VIOLATED</b>		<b>BOND BREACHED</b>	
19 USC 1526(f), 19 CFR 133.27(a), 19 USC 1526(e)		<b>Bond Activity Type:</b> <b>Bond #:</b>	
<b>Description of Bond</b>	<b>Bond Type</b>	<b>Amount</b> \$	<b>Bond Effective Date</b>
<b>Name and Address of Principal on Bond</b>			
<b>Name and Address of Surety on Bond</b>		<b>Surety Identification No</b>	

CBP Form 5955A (01/15)

<b>DEPARTMENT OF HOMELAND SECURITY</b> <b>U.S. CUSTOMS AND BORDER PROTECTION</b> <b>NOTICE OF PENALTY OR LIQUIDATED DAMAGES INCURRED</b> <b>AND DEMAND FOR PAYMENT</b> <b>19 USC 1618 AND 19 USC 1623</b>		Case Number <b>2021290430000101</b>
		Port Code and Name <b>2904 PORTLAND, OR</b>
TO: Vasquez, VERONICA 3530 SOUTHWEST ANTELOPE AVENUE REDMOND, OR 97756		
<p>If you feel there are extenuating circumstances, you have the right to object to the above action. Your petition should explain why you should not be penalized for the cited violation. Write the petition as a letter or in legal form; submit in duplicate, addressed to the Fines, Penalties and Forfeitures Officer at: FPF OFFICE, 8337 NE ALDERWOOD RD, PORTLAND, OR 97220-0000.</p>		
<p>Unless the amount herein demanded is paid or a petition for relief is filed with the FP&amp;F officer within the indicated time limit, further action will be taken in connection with your bond or the matter will be referred to the Justice Department. Payment may be made through pay.gov or by remitting to the address above. Any partial payments will not be considered an accord and satisfaction of the claim.</p>		<b>TIME LIMIT FOR PAYMENT OR FILING PETITION FOR RELIEF</b>  60 days from the date of this notice
Signature <b>MEGAN FISHEL</b>	Title <b>FPF Officer (503) 326-2300</b>	Date <b>10/21/2020</b>

## Seizure case number 2020-2904-000223-01

Quantity	Property Description	CBP TMK #	USPTO reg. #
89 each	counterfeit Louis Vuitton large handbags	07-00786	1045932
31 each	counterfeit Louis Vuitton medium handbags	07-00786	1045932
105 each	counterfeit Louis Vuitton small handbags	07-00786	1045932
9 each	counterfeit Louis Vuitton small makeup bags	07-00786	1045932
14 each	counterfeit Louis Vuitton belts	07-00786	1045932
62 each	counterfeit Louis Vuitton wallets	07-00786	1045932
Trademark Description: Word Mark Louie Vuitton			
30 each	counterfeit Louis Vuitton t-shirts	13-00874	1770131
14 each	counterfeit Louis Vuitton sweatsuits	13-00874	1770131
8 each	counterfeit Louis Vuitton sweaters	13-00874	1770131
11 each	counterfeit Louis Vuitton ball caps	13-00874	1770131
Trademark Description: Toile Monogram - Design			
Trademark Representative: Kenneth Klug (Louis Vuitton)			
Address: 1 E. 57th Street, New York, NY 10022			

Quantity	Property Description	CBP TMK #	USPTO reg. #
4 each	counterfeit Christian Dior Couture handbags	00-00620	1923564
Trademark Description: Dior Stylized			
Trademark Representative: Kenneth Klug, Attention: IP Department			
Address: 1 E. 57th Street, New York, NY 10022			

Quantity	Property Description	CBP TMK #	USPTO reg. #
14 each	counterfeit Gucci large handbags	11-00865	1107311
30 each	counterfeit Gucci small handbags	11-00865	1107311
5 each	counterfeit Gucci wallets	11-00865	1107311
Trademark Description: GG Stylized, G with inverted G, non-interlocking GG			
8 each	counterfeit Gucci belts	11-00923	1106722
Trademark Description: GG Stylized, G with inverted G, non-interlocking GG			
5 each	counterfeit Gucci sweatsuits	06-01012	3072547
49 each	counterfeit Gucci t-shirts	06-01012	3072547
16 each	counterfeit Gucci sweaters	06-01012	3072547
8 each	counterfeit Gucci ballcaps	06-01012	3072547
Trademark Description: GG, Word Mark and Circle Design			
Trademark Representative: Jessica Haugen, Gucci America, Inc. Legal Department			
Address: 195 Broadway, 12th Floor, New York, NY 10007			

Quantity	Property Description	CBP TMK #	USPTO reg. #
17 each	counterfeit Coach small handbags	07-00775	1071000
Trademark Description: Word Mark and Design, CC CC and Design, Paired CC Design			
Trademark Representative: Karla Aspiras, Intellectual Property Counsel			
Address: 10 Hudson Yards, New York, NY 10001			

Quantity	Property Description	CBP TMK #	USPTO reg. #
16 each	counterfeit Chanel sweatsuits	13-00365	4241822

26 each	counterfeit Chanel sweaters	13-00365	4241822
40 each	counterfeit Chanel t-shirts	13-00365	4241822
9 each	counterfeit Chanel ballcaps	13-00365	4241822
1 each	counterfeit Chanel wallet	13-00365	4241822
Trademark Description: Back-to-Back Interlocking CC'S-Stylized			
7 each	counterfeit Chanel large handbags	06-00705	3025934
16 each	counterfeit Chanel small handbags	06-00705	3025934
Trademark Description: three quarter view of Chanel CC monogram			
Trademark Representative: Adrienne Hahn, Chanel Legal Deptment			
Address: 9 West 57th Street, New York, NY 10019			

Quantity	Property Description	CBP TMK #	USPTO reg. #
5 each	counterfeit Burberry large handbags	07-00505	2022789
5 each	counterfeit Burberry small handbags	07-00505	2022789
3 each	counterfeit Burberry wallets	07-00505	2022789
Trademark Description: Red, brown, gray, black & white plaid pattern			
Trademark Representative: Melissa Roth, Esq. Burberry Ltd.			
Address: 444 Madison Avenue, New York, NY 10022			

Quantity	Property Description	CBP TMK #	USPTO reg. #
3 each	counterfeit Puma small handbags	02-00650	1189319
Trademark Description: Word Mark, Puma and Leaping Puma Design			
Trademark Representative: Peter Mastrostefano			
Address: 5 Lyberty Way, Westford, MA 01886			

Quantity	Property Description	CBP TMK #	USPTO reg. #
8 each	counterfeit Adidas sweatsuits	06-00113	1300627
Trademark Description: Adidas Word Mark			
Trademark Representative: Mia Gutierrez			
Address: 5055 N. Greeley Avenue, Mail Stop A-3-12B, Portland, OR 97217			

Quantity	Property Description	CBP TMK #	USPTO reg. #
6 each	counterfeit Versace t-shirts	03-00467	2426052
2 each	counterfeit Versace sweaters	03-00467	2426052
Trademark Description: Word Mark, Versace Jeans Couture			
1 each	counterfeit Michael Kors backpack	09-00185	2520757
Trademark Description: Word Mark, Michael Kors			
Trademark Representative: Jenna Curtis, Director of Brand Protection (Versace/Michael Kors)			
Address: 11 West 42nd Street, New York, NY 10036			

Quantity	Property Description	CBP TMK #	USPTO reg. #
9 each	counterfeit Hermes t-shirts	15-00497	4687132
Trademark Description: H in Stylized Form			
Trademark Representative: Heather McDonald c/o Baker Hostetler LLP			
Address: 45 Rockefeller Plaza, New York, NY 10111			

Quantity	Property Description	CBP TMK #	USPTO reg. #
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2 each	counterfeit Nike t-shirts	05-00178	1277066
Trademark Description: Word Mark NIKE			
4 each	Counterfeit Converse t-shirts	05-00596	1868363
Trademark Description: Word Mark CONVERSE			
Trademark Representative: Newton Vierra, Nike Inc. (Nike /Converse)			
Address: One Bowerman Drive, Beaverton, OR 97005			

Quantity	Property Description	CBP TMK #	USPTO reg. #
5 each	counterfeit Balenciaga t-shirts	18-00262	1018311
Trademark Description: Stylized wording "BALENCIAGA"			
Trademark Representative: G. Roxanne Elings			
Address: 1251 Avenue of the Americas, 21st Floor, New York, NY 10020			

Quantity	Property Description	CBP TMK #	USPTO reg. #
1 each	counterfeit Yves Saint Laurent small handbag	13-00193	1745483
Trademark Description: Word Mark Yves Saint Laurent			
Trademark Representative: Jess Collen The Holyoke-Manhattan Building			
Address: 80 South Highland Avenue, Ossining, NY 10562			

Quantity	Property Description	CBP TMK #	USPTO reg. #
2 each	counterfeit Prada ballcaps	13-00054	2162795
Trademark Description: Word Mark in Stylized Form - PRADA			
Trademark Representative: David R. Warren, VP, General Counsel, Prada USA Corp.			
Address: 620 West 52nd Avenue, New York, NY 10019			

Quantity	Property Description	CBP TMK #	USPTO reg. #
6 each	counterfeit Givenchy t-shirts	07-00793	1282216
Trademark Description: Mark consisting of fanciful arrangement of 4 "G's" in a square			
Trademark Representative: Laurent Marcadier			
Address: 22, Avenue Montaigne, Paris, France 75008			

Quantity	Property Description	CBP TMK #	USPTO reg. #
7 each	counterfeit Fendi t-shirts	17-00580	3940027
Trademark Description: Word Mark Fendi			
Trademark Representative: Marie-Laure Bonnaffous, IP Manager			
Address: Palazzo della Civiltà Italiana, Quadrato della Concordia, 3, Rome, Italy 00144			

<b>Appraised Domestic Value: \$62,177.00</b>
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## Seizure case number 2020-2904-000228-01

Quantity	Property Description	CBP TMK #	USPTO reg. #
9 each	counterfeit Louis Vuitton sweatsuits	13-00874	1770131
4 each	counterfeit Louis Vuitton shirts	13-00874	1770131
4 each	counterfeit Louis Vuitton wallets	13-00874	1770131
1 each	counterfeit Louis Vuitton makeup case	13-00874	1770131
Trademark Description: Toile Monogram - Design			
1 each	counterfeit Louis Vuitton belt	07-00786	1045932
Trademark Description: Word Mark Louis Vuitton			
3 each	counterfeit Louis Vuitton watches	07-00762	2904197
Trademark Description: Word Mark Louis Vuitton			
2 each	counterfeit Louis Vuitton ballcaps	04-00361	1794905
Trademark Description: Word Mark in Stylized Form - LV			
Trademark Representative: Kenneth Klug (Louis Vuitton)			
Address: 1 E. 57th Street, New York, NY 10022			

Quantity	Property Description	CBP TMK #	USPTO reg. #
5 each	counterfeit Christian Dior Couture brooches	00-00620	1923564
Trademark Description: Dior Stylized			
Trademark Representative: Kenneth Klug, Attention: IP Department			
Address: 1 E. 57th Street, New York, NY 10022			

Quantity	Property Description	CBP TMK #	USPTO reg. #
3 each	counterfeit Gucci makeup cases	18-00373	5073022
3 each	counterfeit Gucci small handbags	18-00373	5073022
3 each	counterfeit Gucci wallets	18-00373	5073022
Trademark Description: Letter GG Stylized Format			
5 each	counterfeit Gucci sweaters	06-01012	3072547
2 each	counterfeit Gucci t-shirts	06-01012	3072547
3 each	counterfeit Gucci ballcaps	06-01012	3072547
Trademark Description: GG, Word Mark and Circle Design			
5 pair	counterfeit Gucci earrings	12-01159	3470140
5 each	counterfeit Gucci brooches	12-01159	3470140
Trademark Description: Interlocking Non-Facing GG			
Trademark Representative: Jessica Haugen, Gucci America, Inc. Legal Department			
Address: 195 Broadway, 12th Floor, New York, NY 10007			

Quantity	Property Description	CBP TMK #	USPTO reg. #
3 each	counterfeit Chanel sweatsuits	13-00365	4241822
14 each	counterfeit Chanel shirts	13-00365	4241822
4 each	counterfeit Chanel ballcaps	13-00365	4241822
Trademark Description: Back-to-Back Interlocking CC'S-Stylized			
5 each	counterfeit Chanel wallet	02-00742	1733051
6 each	counterfeit Chanel small handbags	02-00742	1733051
Trademark Description: Word Mark, Chanel			
89 pair	counterfeit Chanel earrings	89-00299	1501898

13 each	counterfeit Chanel brooches	89-00299	1501898
Trademark Description: Back-to-Back Interlocking Cs			
Trademark Representative: Adrienne Hahn, Chanel Legal Deptment			
Address: 9 West 57th Street, New York, NY 10019			

Quantity	Property Description	CBP TMK #	USPTO reg. #
1 each	counterfeit Burberry sweatsuit	05-00695	1241222
1 each	counterfeit Burberry sweater	05-00695	1241222
Trademark Description: Red, brown, gray, black & white plaid pattern			
Trademark Representative: Melissa Roth, Esq. Burberry Ltd.			
Address: 444 Madison Avenue, New York, NY 10022			

Quantity	Property Description	CBP TMK #	USPTO reg. #
1 each	counterfeit Hermes belt	15-00497	4687132
Trademark Description: H in Stylized Form			
Trademark Representative: Heather McDonald c/o Baker Hostetler LLP			
Address: 45 Rockefeller Plaza, New York, NY 10111			

Quantity	Property Description	CBP TMK #	USPTO reg. #
2 each	counterfeit Nike sweaters	05-00178	1277066
Trademark Description: Word Mark NIKE			
Trademark Representative: Newton Vierra, Nike Inc. (Nike /Converse)			
Address: One Bowerman Drive, Beaverton, OR 97005			

Quantity	Property Description	CBP TMK #	USPTO reg. #
2 pair	counterfeit Yves Saint Laurent earrings	13-00193	1745483
Trademark Description: Word Mark Yves Saint Laurent			
Trademark Representative: Jess Collen The Holyoke-Manhattan Building			
Address: 80 South Highland Avenue, Ossining, NY 10562			

Quantity	Property Description	CBP TMK #	USPTO reg. #
1 each	counterfeit Tommy Hilfiger sweatsuit	93-00727	1398612
Trademark Description: Word Mark Tommy Hilfiger			
Trademark Representative: Simon Bock			
Address: 285 Madison Avenue, 6th Floor, New York, NY 10001			

Quantity	Property Description	CBP TMK #	USPTO reg. #
1 each	counterfeit Fendi ballcap	17-00580	3940027
1 each	counterfeit Fendi belt	17-00580	3940027
Trademark Description: Word Mark Fendi			
Trademark Representative: Marie-Laure Bonnaffous, IP Manager			
Address: Palazzo della Civiltà Italiana, Quadrato della Concordia, 3, Rome, Italy 00144			

<b>Appraised Domestic Value: \$11,799.00</b>
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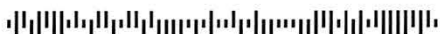


# U.S. Customs and Border Protection

FPF OFFICE  
8337 NE ALDERWOOD RD  
PORTLAND OR 97220-0000

This Bill is a notice of debt currently owed to U.S. Customs and Border Protection (CBP).

676 1 MB 0.439 P2 T3 43949-1-7-1  
BILL TO: VASQUEZ, VERONICA  
3530 SOUTHWEST ANTELOPE AVENUE  
REDMOND OR 97756



Importer Number:

Bill Number: FP00038435

Bill Date: 12/26/2020

Port of Service/Charge: 2904

For Bill Inquiries Please Contact the CBP Port Office at (503) 326-2300.

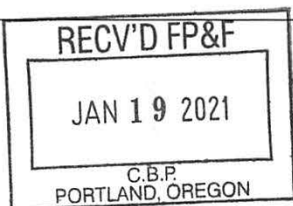
Transaction Date	Reference Name	Transaction Identification	Type of Charge	Amount
10/21/2020	FPF CASE	2021290430000101	PENALTY	882368.00

APPROPRIATE ACTION WAS NOT TAKEN ON THE ASSESSED CLAIM.  
THE CLAIM IS DUE AND PAYABLE WITHIN TEN (10) DAYS FROM  
THE DATE OF THIS DEMAND.

VIOLATOR: VASQUEZ, VERONICA

VIOLATION DATE: 03-30-2020

FIRST NOTICE



**Pay Full Amount Due upon Receipt: 882368.00**

PAYER'S COPY

CBP FORM 6084SC (03/12)

Enclose this portion with remittance

Bill Date: 12/26/2020  
Bill To: VASQUEZ, VERONICA  
3530 SOUTHWEST ANTELOPE AVENUE  
REDMOND OR 97756

Bill Number: FP00038435  
Transaction Identification: 2021290430000101  
FIRST NOTICE  
Amount Due: 882368.00  
Amount Enclosed: \_\_\_\_\_

FPF OFFICE  
8337 NE ALDERWOOD RD  
PORTLAND OR 97220-0000



PLEASE ADVISE OF ANY ADDRESS CHANGE

CBP FORM 6084SC (03/12)



# U.S. Customs and Border Protection

FPF OFFICE  
8337 NE ALDERWOOD RD  
PORTLAND OR 97220

This Bill is a notice of debt currently owed to U.S. Customs and Border Protection (CBP).

583 1 MB 0.439 P2 T3 44052-1-3-1  
BILL TO: VASQUEZ, VERONICA  
3530 SOUTHWEST ANTELOPE AVENUE  
REDMOND OR 97756



Importer Number:  
Bill Number: FP00038435  
Bill Date: 01/09/2021  
Port of Service/Charge: 2904

For Bill Inquiries Please Contact the CBP Port Office at (503) 335-2950.

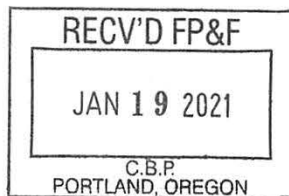
Transaction Date	Reference Name	Transaction Identification	Type of Charge	Amount
10/21/2020	FPF CASE	2021290430000101	PENALTY	882368.00

THIS CLAIM IS DELINQUENT. IF NOT SATISFIED  
IMMEDIATELY, SANCTIONS MAY BE PROPOSED AND THE CLAIM  
REFERRED FOR LEGAL ACTION.

VIOLATOR: VASQUEZ, VERONICA

VIOLATION DATE: 03-30-2020

SECOND NOTICE ISSUED



**Pay Full Amount Due upon Receipt: 882368.00**

PAYER'S COPY

CBP FORM 6084SC (03/12)

Enclose this portion with remittance

Bill Date: 01/09/2021  
Bill To: VASQUEZ, VERONICA  
3530 SOUTHWEST ANTELOPE AVENUE  
REDMOND OR 97756

Bill Number: FP00038435  
Transaction Identification: 2021290430000101  
SECOND NOTICE ISSUED  
Amount Due: 882368.00  
Amount Enclosed: \_\_\_\_\_

FPF OFFICE  
8337 NE ALDERWOOD RD  
PORTLAND OR 97220



PLEASE ADVISE OF ANY ADDRESS CHANGE

CBP FORM 6084SC (03/12)





# U.S. Customs and Border Protection

FPF OFFICE  
8337 NE ALDERWOOD RD  
PORTLAND OR 97220

This Bill is a notice of debt currently owed to U.S. Customs and Border Protection (CBP).

631 1 MB 0.450 P2 T3 44052-1-7-1  
BILL TO: VASQUEZ, VERONICA  
3530 SOUTHWEST ANTELOPE AVENUE  
REDMOND OR 97756



Importer Number:

Bill Number: FP00038435

Bill Date: 01/23/2021

Port of Service/Charge: 2904

For Bill Inquiries Please Contact the CBP Port Office at (503) 335-2950.

Transaction Date	Reference Name	Transaction Identification	Type of Charge	Amount
10/21/2020	FPF CASE	2021290430000101	PENALTY	882368.00

FINAL DEMAND - DELINQUENT ACCOUNT. CLAIM WILL BE  
REFERRED FOR SANCTIONS AND LEGAL ACTION TEN (10) DAYS  
FROM THE DATE OF THIS DEMAND.

VIOLATOR: VASQUEZ, VERONICA

VIOLATION DATE: 03-30-2020

THIRD NOTICE ISSUED

**Pay Full Amount Due upon Receipt: 882368.00**

PAYER'S COPY

CBP FORM 6084SC (03/12)

Enclose this portion with remittance

Bill Date: 01/23/2021  
Bill To: VASQUEZ, VERONICA  
3530 SOUTHWEST ANTELOPE AVENUE  
REDMOND OR 97756



Bill Number: FP00038435  
Transaction Identification: 2021290430000101  
THIRD NOTICE ISSUED  
Amount Due: 882368.00  
Amount Enclosed: \_\_\_\_\_

FPF OFFICE  
8337 NE ALDERWOOD RD  
PORTLAND OR 97220

PLEASE ADVISE OF ANY ADDRESS CHANGE

CBP FORM 6084SC (03/12)

U.S. DEPARTMENT OF HOMELAND SECURITY  
Office of the Assistant Chief Counsel  
1000 Second Avenue, Ste 2200  
Seattle, WA 98104



**U.S. Customs and  
Border Protection**

DATE: March 25, 2021  
FILE: SE-2021-00111:IZ

Ms. Veronica Vasquez  
3530 Southwest Antelope Avenue  
Redmond, OR 97756

Re: U.S. Customs and Border Protection (CBP) Penalty Case No. 2021290430000101

Dear Ms. Vasquez:

This is the final demand for payment of a penalty in the amount of \$882,368. The penalty was assessed against you pursuant to 19 U.S.C. § 1526(f) for the importation of merchandise determined to be infringing on 31 registered trademarks, including Luis Vuitton, Gucci, Christian Dior, and Burberry. The infringing merchandise, with a total domestic value of \$73,976, was seized under CBP case 2020290400022301 and case 2020290400022801. You have previously been provided with copies of the Notice of Penalty and related documents. Demand for payment has been made against you since at least December 26, 2020. As of the date of this letter, payment of the outstanding amount has not been received.

The Director, Fines, Penalties and Forfeitures, U.S. Customs and Border Protection (CBP), has forwarded this matter to my office for referral to the Office of the United States Attorney for initiation of collection litigation. However, before we initiate costly litigation, we would like to offer you a final opportunity to make this payment or otherwise resolve this matter with us. Payment should be made by check payable to CBP and mailed to this office at the address above within 15 days of the date of this letter. We remain willing to consider other resolutions to this case. However, should you fail to pay this penalty or make other arrangements for its disposition, we will take all appropriate steps to collect this debt, including referral to the U.S. Attorney's Office for institution of a collection action.

If you have any questions, or would like to discuss this matter, please contact me or Attorney Ina Zing of my office at (206) 512-7086 or [ina.a.zing@cbp.dhs.gov](mailto:ina.a.zing@cbp.dhs.gov).

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth K. Yaeger".

Elizabeth K. Yaeger  
Assistant Chief Counsel

**PORTLAND MAIN OFFICE**

1000 SW Third Avenue, Suite 600  
Portland, Oregon 97204  
(503) 727-1000  
[www.usdoj.gov/usao/or](http://www.usdoj.gov/usao/or)



**U.S. DEPARTMENT OF JUSTICE**

United States Attorney's Office  
District of Oregon  
Natalie K. Wight  
United States Attorney

**EUGENE BRANCH**

405 E 8th Avenue, Suite 2400  
Eugene, Oregon 97401  
(541) 465-6771

**MEDFORD BRANCH**

310 West Sixth Street  
Medford, Oregon 97501  
(541) 776-3564

M. Alex DeLorenzo  
Assistant United States Attorney  
(503) 727-1000  
*Reply to Portland Office*

June 7, 2024

**VIA FIRST CLASS AND CERTIFIED MAIL**

Veronica Vasquez  
3530 Southwest Antelope Avenue  
Redmond, OR 97756

Re: U.S. Customs and Border Protection Penalty Case No. 2021290430000101  
Total Amount Due: \$882,368.00  
Payment Due Date: Immediately

Dear Ms. Vasquez:

The U.S. Customs and Border Protection ("Customs") has referred your debt in the above referenced amount to the United States Attorney's Office to initiate federal enforcement actions against you for the collection of this debt. If enforcement actions are filed, this office will seek additional costs and fees where applicable, which will be added to your debt.

To avoid legal action against you and further increases to the amount you owe, you should pay this debt in full, immediately upon receipt of this letter, or contact the United States Attorney's Office at (503) 727-1000 to discuss this debt. If you or your attorney do not contact this office the following may occur:

- The federal court can enter a judgment ordering you to pay. Judgments do not expire and may appear on your credit report.
- Liens may be placed on any property you own, which means you cannot sell or transfer your property until the debt has been paid in full.
- Enforcement of the judgment may include attachment or execution of your non-exempt personal property, offset of your federal tax refund, and garnishment of your wages.

How do you pay your debt?

- Pay Online: Visit <https://pay.gov/public/form/start/5137251>
- Pay by Mail: Send a check or money order payable to the U.S. Department of Justice in the enclosed, self-addressed envelope and include your name and the above referenced case number on the face of your check.

Sincerely,

NICOLE SMITH  
Paralegal Specialist



1000 Second Avenue, Suite 2200  
Seattle, WA 98104



**U.S. Customs and  
Border Protection**

DATE: May 29, 2024  
FILE: SE:2021-001111:IZ

**CERTIFICATE OF INDEBTEDNESS**

Debtor's Name: Veronica Vasquez  
Debtor's Address: 3530 SW Antelope Avenue, Redmond, Oregon 97756  
Debtor's Social Security Number: 560-59-1813  
Total debt due United States as of May 29, 2024: \$882,368

I certify that records show that the debtor named above is indebted to the United States in the amount stated above.

**Summary of debt origination:**

The claim arose in connection with a civil penalty issued to the debtor under 19 U.S.C. § 1526(f) for the importation of merchandise determined to be infringing on multiple trademarks.

Agency claim number: 2021290430000101  
Notice of Penalty (date debt incurred): October 21, 2020  
First bill: December 26, 2020  
Second bill: January 9, 2021  
Third bill: January 23, 2021  
Final demand letter: March 25, 2021  
Principal: \$882,368  
Interest: not applicable  
Administrative fees: not applicable  
Penalties for non-payment: not applicable  
Payment History: none

**CERTIFICATION:** Pursuant to 28 USC § 1746, I certify under penalty of perjury that the foregoing is true and correct.

A handwritten signature in blue ink that reads "Ina A. Zing".

Ina A. Zing  
Attorney

May 29, 2024  
Date